



Donald Schwartz <dona1d@lawofficedona1dschwartz.com>

Re: Royce International, et v. Dariush Adli and Adli Law Group Matter11:51:02
-1 message22:22
Donald Schwartz <dona1d@lawofficedona1dschwartz.com>

Wed, Sep 7, 2022 at 5:33 PM

22:22
To: "Rallis, Dean" <drallis@hahnlawyers.com>22:22
Bcc: Edward Stolz <Edward_Stolz@comcast.net>, Samuel Bellicini <sam@statebaradvice.com>22:22
Mr. Rallis,22:22
Page
Alex Baker substituted into the case for himself so I have no control over what he is doing. The substitution of attorney is filed. He served the summons/complaint apparently on both defendants as to and for himself only. You'll have to talk to him as to what he is doing.22:22
Email
I am waiting for any additional meet and confer from you as to Royce. I will consider dismissing the Adli Law Group once I am convinced the stay applies and/or the statute of limitations is tolled. Oddly, I could find no clear authorities on the issue of the tort allegations being stayed in this context. Can you help with legal authorities the this regard?22:22
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Out
I am concerned about the divergence of representation now arisen for plaintiffs Baker and Royce and am looking to resolve this issue as well, but the stay issue needs to be finalized, I would think.22:22
Baker
Thanks.22:22
His
Donald Charles Schwartz, M.B.A., J.D.22:22
Donald C. Schwartz
Law Office of Donald C. Schwartz
7960-B Soquel Drive, No. 291
Sunnyvale, CA 9500322:22
Aptos, CA 95003
Donald@lawofficedona1dschwartz.com
(415) 331-9909/Fax: (815) 301-655622:22
Desire
Sent from iPhone22:22
On Sep 7, 2022, at 4:21 PM, Rallis, Dean <drallis@hahnlawyers.com> wrote:22:22
Mr. Schwartz,

Thanks for your prompt email response.

Please advise if the complaint has been withdrawn or dismissed.

Dean

Dean G. Rallis Jr.

HAHN & HAHN LLP

Direct (626) 683-4321 | hahnlawyers.com

Cell: (818) 634-9698

From: Donald Schwartz <donaidd@lawofficedonaldschwartz.com>

Sent: Wednesday, September 7, 2022 4:09 PM

To: Rallis, Dean <drallis@hahnlawyers.com>

Subject: Re: Royce International, et v. Dariush Adli and Adli Law Group Matter

[External]

OK - thanks.

In trial in Santa Maria for three weeks.

Will call.

Donald Charles Schwartz, MBA, JD

Law Office of Donald C. Schwartz

7960-B Soquel Drive, No. 291

Aptos, CA 95003

831-331-9909/Fax: 815-301-6556

donald@lawofficedonaldschwartz.com

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On Wed, Sep 7, 2022 at 4:05 PM Rallis, Dean <drallis@hahnlawyers.com> wrote:

Mr. Schwartz –

I attempted to contact you by telephone, but was not able to leave a message. Please call me regarding this matter at your earliest convenience. The best number to reach me is on my cell (below).

Thanks.

Dean

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Cell: (818) 634-9698

From: Donald Schwartz <donaidschwartz.com>

Sent: Saturday, August 20, 2022 2:46 PM

To: Jessica L. Evans <jlevans@hahnlawyers.com>; Rallis, Dean <drallis@hahnlawyers.com>

Subject: Royce International, et v. Darius Adli and Adli Law Group Matter

[External]

Counsel,

Please find the attached letter.

Thank you.

Donald Charles Schwartz, MBA, JD

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Donald Schwartz <donald@lawofficedonaldschwartz.com>

Re: Royce International, et v. Dariush Adli and Adli Law Group Matter11:02
1 message

Donald Schwartz <donald@lawofficedonaldschwartz.com>

Wed, Sep 7, 2022 at 7:43 PM

To: "Rallis, Dean" <drallis@hahnlawyers.com>

I dismiss (without prejudice) the Royce complaint, do you agree that the statutes of limitation are tolled against same?

Donald Charles Schwartz, M.B.A., J.D.

Law Office of Donald C. Schwartz

1960-B Soquel Drive, No. 291

Aptos, CA 95003

donald@lawofficedonaldschwartz.com

(831) 331-9909/Fax: (815) 301-6556

Sent from iPhone

On Sep 7, 2022, at 7:09 PM, Rallis, Dean <drallis@hahnlawyers.com> wrote:

Mr. Schwartz –

Thanks, again, for your prompt response.

Please send me the contact information for Mr. Baker, including his email address.

Re the applicability of the stay, it is generally hornbook law that any action on a prepetition claim is subject to the automatic stay. With limited exceptions that do not apply in this instance (see 362(b)), pursuing a prepetition claim after a bankruptcy case is filed constitutes a violation of the stay. I encourage you to do any necessary research, which should direct you to the same conclusion. Let me know when you are ready for a meet and confer, in which I am willing to participate as a courtesy to you. There is no such procedure required in connection with stay violations.

My client reserves all rights and remedies in connection with this matter.

Dean

Dean G. Rallis Jr.

HAHN & HAHN LLP

Direct (626) 683-4321 | hahnlawyers.com

Cell: (818) 634-9698

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